

File No. EB-08-TC-5140
Affidavit Pursuant to 47 C.F.R. §1.16

I certify under penalty of perjury that the information submitted by RH Telecommunications, Inc. in this matter is true and correct.

Name: Hussein Farah

Title: CEO

Signature: 
Hussein Farah, CEO
RH Telecommunications, Inc.

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification of RH Telecom, Inc. for 2007

EB Docket 06-36

Date filed: September 10, 2008

Form 499 Filer ID: 826673

Name of signatory: Hussein Farah

Title of signatory: Officer

I, Hussein Farah certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed 
Hussein Farah, CEO

**STATEMENT REGARDING OPERATING PROCEDURES IMPLEMENTING 47 C.F.R.
SUBPART U GOVERNING THE USE OF CUSTOMER PROPRIETARY NETWORK
INFORMATION ("CPNI")**

RH Telecom, Inc. (RH Telecom) has established policies and procedures to assure compliance with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Information ("CPNI") § 64.2001et. seq. of the Commission's rules.

I. Use Of CPNI Without Customer Approval

A. RH Telecom may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from RH Telecom, without customer approval. RH Telecom does not share customer CPNI with any affiliates, joint venture partners, or contractors.

B. RH Telecom does not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the subscriber does not already subscribe from RH Telecom without customer approval as described in Section I.C

(1) RH Telecom may use, disclose, or permit access to CPNI derived from the provision of interexchange service, without customer approval for the provision of CPE and information service(s)

(2) RH Telecom may not and does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers. For example RH Telecom cannot use interexchange CPNI to track all customers that call long distance competitors.

C. Although RH Telecom does not currently do so, under the Commissions rules, RH Telecom may use, disclose, or permit access to CPNI without customer approval, as follows:

1. RH Telecom may use, disclose, or permit access to CPNI in its provision of inside wiring, maintenance, and repair services

2. RH Telecom may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of CMRS

3. RH Telecom may use CPNI to market services formerly known as adjunct to-basic services, such as but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.

D. RH Telecom may use, disclose, or permit access to CPNI to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

II. Approval Required For Use Of CPNI RH Telecom does not obtain approvals for use of CPNI because RH Telecom does not use or disclose customer CPNI in any manner that requires customer approval. RH Telecom's operating procedures generally prohibit the disclosure of CPNI for the purpose of marketing communications-related services to existing customers by its agents, joint venture partners, and independent contractors.

III. Notice Required For Use Of CPNI RH Telecom does not use customer CPNI for any purposes which currently require customer approval. In the event that at a future time RH Telecom wishes to use customer CPNI in a manner that requires customer approval, it will do so

in accordance with the approval and notice requirements specified in Sections 47 CFR 64.2007 - 64.2008 of the Commission's rules.

IV. Safeguards On The Disclosure Of Customer Proprietary Network Information. RH Telecom has procedures in place to assure that customers are properly authenticated prior to disclosing CPNI. At this time, RH Telecom only provides prepaid calling card services. As such, customers are authenticated by providing the PIN associated with the calling card. If a customer does not provide a prepaid calling card PIN, the customer is not provided with CPNI.

V. Notification of Customer Proprietary Network Information Security Breaches. – In the case of a breach, RH Telecom will as soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) through the FCC link at <http://www.fcc.gov/eb/cpni>.

(a) Notify customers only after 7 full business days have passed after notification to the USSS and the FBI unless the USSS or FBI has requested an extension.

(b) If there is an extraordinarily urgent need to notify affected customers or the public sooner in order to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency. RH Telecom shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.

(c) Maintain a record of any breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will include if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. RH Telecom shall retain the record for a minimum of 2 years.

(d) Include a summary of the breach in the annual compliance certificate filed with the FCC.

VI. Record Retention

RH Telecom shall retain all information regarding CPNI. Following are the minimum retention periods RH Telecom has established:

- CPNI notification and records of approval if used – five years
- Marketing campaign if used – one year
- Breaches: five years
- Annual Certification – five years
- Employee training certification – five years
- All other information – two years.